

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

TICORA WILLIAMS,

Civil Action File No.  
1:11-cv-03712-RLV

Plaintiff,

v.

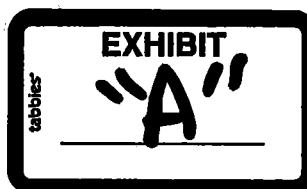
WAL-MART STORES EAST, LP,

Defendant.

PLAINTIFF'S NOTICE OF INSPECTION OF DEFENDANT'S PREMISES

**TO: Wal-Mart Stores East, LP  
c/o Albert J. DeCusati, Esq.  
3445 Peachtree Road, N.E.  
Suite 500  
Atlanta, Georgia 30326-1276**

YOU ARE HEREBY NOTIFIED, pursuant to Federal Rule of Civil Procedure 34 (a) (2), that on **Friday, April 13, 2012, at 10:00 a.m.**, counsel for Plaintiff shall enter the premises of Defendant Wal-Mart Stores East, LP located at 6149 Old National Highway, College Park, Fulton County, Georgia 30349, for the purpose of inspecting, measuring, photographing, and any other examination allowed by Federal Rule of Civil Procedure 34 (a) (2) of the aisle and surrounding areas where Plaintiff slipped and fell on September 23, 2010, and as more fully described in Plaintiff's Complaint and by the witnesses who have given deposition



testimony in this matter. Thereafter, Plaintiff shall inspect the surveillance video monitor(s) of the Asset Protection Office at Defendant's store, including the screen shots for the surveillance cameras in and around the area where Plaintiff slipped and fell on September 23, 2010. All parties are invited to attend.

This 14th day of March, 2012.

Respectfully submitted,

**CASH, KRUGLER & FREDERICKS, LLC**

/s/ James A. Robson  
Andrew B. Cash, Esq.  
Georgia Bar Number 743459  
James A. Robson, Esq.  
Georgia Bar Number 551053

5447 Roswell Road, N.E.  
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acash@ckandf.com  
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**Counsel for Plaintiff**

**Local Rule 5.1 and 7.1 Certification**

Pursuant to Local Rules 5.1 and 7.1, counsel for the Plaintiff certifies that the document has been prepared in Times New Roman, 14-point font, and that the document does not contain more than 10 characters per inch of type.

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing **PLAINTIFF'S NOTICE OF INSPECTION OF DEFENDANT'S PREMISES** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to attorneys of record:

Albert J. DeCusati, Esq.  
Ashley A. Bagiatis, Esq.  
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This 14th day of March, 2012.

**CASH, KRUGLER & FREDERICKS, LLC**

/s/ James A. Robson  
Andrew B. Cash, Esq.  
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**Counsel for Plaintiff**